

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN THE MATTER OF THE SEARCH OF
INFORMATION ON Website: URL site
<http://clientaccounting.#####.com>

**APPLICATION FOR ORDER ALLOWING FOR DELAYED DISCLOSURE OF THE
EXISTENCE OF A SEARCH WARRANT**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court – based on the information contained in the affidavit accompanying the search warrant – allow the Government not to notify any person (including the subscribers, owners, users or customers of the websites listed in the search warrant) of the existence of the search warrant in the above captioned matter until January 25, 2019, absent further order of the Court.

The purpose of the Government's request is to protect the information contained within these documents to avoid premature disclosure of the investigation, including by giving targets the opportunity to destroy or tamper with evidence (including electronic evidence), change patterns of behavior, intimidate potential witnesses and obstruct justice - the Government would reference the affidavit to support these findings as there is on-going criminal activity and certain members of the conspiracy are outside the United States – the Government submits this is to defeat effective prosecution of their criminal activity. Accordingly, there is reason to believe that notification of the existence of the search warrant will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution (two of the individuals are currently operating outside the jurisdiction of the United States), destroy or tamper with evidence, change patterns of behavior, or notify confederates. See 18 U.S.C. §

3103(a)(b)(1) referencing 18 U.S.C. § 2705(b).

WHEREFORE, the United States respectfully requests that the Court grant the attached Order allowing the Government not to disclose the existence or content of the search warrant until January 25, 2019.

BETH DRAKE
UNITED STATES ATTORNEY

By: s/Jim May
Jim May
Assistant United States Attorney

February 5, 2018